

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO**

IN RE:

**HERNAN OCASIO RAMOS and
LUZ DELIA DIAZ PAGAN**

Debtors

**HERNAN OCASIO RAMOS and
LUZ DELIA DIAZ PAGAN**

Plaintiff's

PRAMCO II, LLC, et als

Defendants

Case No. 05-05091 (ESL)

Chapter 13

Adv. Proc. No. 06-00181-ESL

RE: Violation of Stay

**MOTION REQUESTING INTERPRETER FOR DEPOSITION
TO BE TAKEN ON MAY 1ST, 2007**

COME(S) now Plaintiff's represented by the undersigned attorneys and very respectfully states, alleges and prays:

1. Last April 27th, 2007, defendant Pramco II, LLC, notified plaintiffs deposition to be taken next May 1st, 2007, starting at 9:30 am in the offices of Oneil & Gilmore.(Dockets #41 &42)

2. The undersigned became aware of said notification sometime in the afternoon of Friday April 27th, 2007, on or around 5:00 pm..

3. Within said notification defendant Pramco II, LLC requested the following :

"If the deponent is in need of the services of an interpreter, one will be so provided if the request is made the next fifteen (15) days by calling the telephone number of the undersigned attorney listed on the last page of the instant notice".

4. The undersigned attorney tried to reach the attorney listed

on the last page of the notice of deposition as well as the lead attorney for Pramco first on Friday 27th, 2007, by calling the office for defendant Pramco II, LLC, and the answering machine was on., then we call again on Saturday April 28th, around 4:30 pm and this time, left a voicemail message, informing the need for an interpreter.

5. In order to avoid misunderstandings causing undue delay and to avoid a second suspension of plaintiff's deposition, herein party hereby notifies the need for an interpreter for the deposition to be taken to Hernan Ocasio Ramos and Luz Delia Diaz.

WHEREFORE it is requested from this Honorable Court to grant the present motion.

In San Juan, Puerto Rico, this 30th of April, 2007.

I HEREBY CERTIFY: That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to all participants of the CM/ECF System and to the following: Chapter 13 Trustee **José R. Carrión, Esq.**, US Trustee **Monsita Lecaroz Arribas**, co-defendant Pramco through their legal counsel, **Charles Gilmore, Esq.**, co-defendant **Francisco Fernández Chiquéz, Esq.**, and I hereby certify that I have mailed by regular mail to all parties in interest.

RESPECTFULLY SUBMITTED.

/S/ SIGRID LOPEZ GONZALEZ

Law Offices Sigrid López-González
USDC PR 126806
PO BOX 195233
SAN JUAN, PR 00919-5233
Tel. 787-758-4400
Fax. 787-763-0144
E-mail: sigrid@prtc.net

-and-

/S/MARILYN VALDES ORTEGA

Marilyn Valdes Ortega Law Offices
USDC PR 214711
PO BOX 195596
SAN JUAN, PR 00919-5596
Tel. 787-758-4400
Fax. 787-763-0144
E-mail: valdeslaw@prtc.net